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October 3, 2022

Via ECF

Hon. J. Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re: Request for Extension of Time to Respond
Muhammad v. Imperix Construction Inc. et al; 1:22-cv-06904-ALC

Dear Judge Carter,

We represent defendants Imperix Construction, Inc. and Tomasz Korasadowicz in the above-referenced matter. Our clients are working diligently to obtain payroll, employment and/or project records in order to assess the claims asserted in plaintiff's Summons and Complaint served on September 13, 2022. Accordingly, we respectfully request an extension of three (3) weeks, to October 24, 2022, to respond to the Complaint.

The original date to respond to the Complaint is October 4, 2022. This is defendants' first request for an extension of time in this matter and Plaintiff's counsel, Joshua Levin-Epstein, has confirmed consent to the time extension requested herein.

We thank the Court in advance for its time in considering this request and apologize that, under the individual practice rules, it is one day late.

Respectfully submitted,



Ariana Marte Acevedo

cc: Joshua Levin-Epstein, Esq. (via ECF)
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